

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Cleco Power, LLC	AI #:	2432	TEMPO Activity No:	PER20080001
Facility Name:	Teeche Power Station	Remarks Submitted by:			
Permit Writer:	Sam Phillips	Permit Writer Email address:	Sanford.Phillips@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information ***must be submitted***. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – ***DO NOT COMPLETE THIS SECTION.*** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.

- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Part 70 Permit, Air Permit Briefing Sheet – Title	Remove CLECO Corp – Environmental Services Dept	This change was made.
Part 70 Permit, General Information	<u>Also Known As</u> ID – 12004, CLECO Corp – Proposed Acadia Power Station needs to be removed from this permit general information.	This change was not made. The information shown on the General Information Sheet is a summary of facility-level information contained in LDEQ’s TEMPO database for this facility and is not considered a part of the permit. The referenced entry on this sheet represents historical information that LDEQ has regarding this facility and should not be assumed to be current.
Part 70 Permit, General Information	<u>Related People</u> 1. Remove Mike Flynn as the Air Permit Contact and replace with Robert Knott, PO Box 5000, Pineville LA 71361-5000. 318-484-7664 (WP) 318-484-7397 (WF). 2. Remove Robbie LaBorde as the responsible official and replace with Steve Carter, PO Box 5000, Pineville LA 71361-5000. 318-484-7707 (WP) 318-484-7497 (WF). 3. Remove Paul Miller as the Water Permit Contact and replace with Brent Croom, PO Box 5000, Pineville LA 71361-5000. 318-484-7742 (WP) 318-484-7397 (WF).	These changes were made.

Part 70 Permit, General Information	Related Organizations (Emission Inventory Billing Party) 1. Change the Emission Inventory Billing Party address to Environmental Manager PGO6 Pineville LA 71361-5000. 2. Change CLECO Power LLC to CLECO Corp – Environmental Services Department.	The change requested in Item 1 was made. The change requested in Item 2 was not made. CLECO Corp – Environmental Services Dept is neither the owner nor the operator of the Teche Power Station. If CLECO wishes to change the Emission Inventory Billing Party, CLECO contact the appropriate personnel using the contact information found at the end of the General Information Sheet.
Part 70 Permit, Inventories	Annual Maintenance Fee The entire fee section is incorrect. This section only list the multiplier of 5.29 which was used in the TPS4 Application for fees associated with the application. This section should show fees associated with GRP 0004. As listed in the current permit, the fees should be as follows: <ul style="list-style-type: none"> • 71 + 35(black start)= 106 (1420- C) • 359 (TPS3) (1410- B) 	This change was made.
Specific Requirement (EQT 0014)	CT-01 – Black Start Turbine (SR 33) This requirement allows an exemption from the NOx limit if the turbine is an emergency combustion turbine. CT-01 will be operated as a generating unit and also used for Black Start capability. Table 2 in the application contains a NOx limit as well as monitoring requirements. Should the regulation 60.4390(a) for SR 33 be replaced with 60.4340(a) as listed in the application due to the unit being used as a generating unit as well as for emergency conditions (black start use) ?	This unit is subject to the NOx limitations of 40 CFR 60 Subpart KKKK. The conditions that apply to this unit have been revised to reflect this.
Specific Requirement (EQT 0014)	CT-01 – Black Start Turbine (SR 35, 36) CLECO requests changing the operating hours from a twelve consecutive month period to a calendar year? Total operating hours will be recorded for each month as well a total year to date record not to exceed 2,500 hr/yr.	This change was not made. Without a rolling 12 month average, the unit could possibly emit greater than the PSD significance level for NOx and/or CO during a 12 month period, which would make the project subject to PSD. The project is not currently subject to PSD review and BACT was not incorporated into this permit for this project.
Specific Requirement (EQT 0014)	CT-01 – Black Start Turbine (SR 31) CLECO requests removing remove SR 31 due to Teche Power Station combusting natural gas and electing to demonstrate total sulfur specified in 40.4365(a)? The requirements for 40.4365(a) will be demonstrated during the initial performance test.	This change was not made. The referenced specific condition provides for the requested exemption.